

# Privacy Policy of the "Business Advisor" Application

Last Updated: April 7, 2025

## 1. Introduction

Welcome to Business Advisor! We take your privacy seriously and are committed to protecting your personal data. This Privacy Policy describes how Valeriy Samovarov ("Developer," "we," "us," or "our"), acting as the Data Controller, collects, uses, discloses, transfers, and safeguards your information when you use the Business Advisor mobile application ("App").

Please read this Policy carefully. By using the App, you acknowledge that you have reviewed it.

## 2. Data Controller

The controller of your personal data is:

Valeriy Samovarov

Email for data protection inquiries: [support@vaultoria.com](mailto:support@vaultoria.com)

## 3. Information We Collect

We collect the following categories of information:

- Personal Information Provided Directly by You:
  - Name
  - Email address (required to create your account and grant access to App features).
- Automatically Collected Information When Using the App:
  - Device Data: Anonymized or pseudonymized device identifiers (e.g., Device ID, advertising ID), device model, and operating system version.

- Usage Data: Aggregated and anonymized information about your interactions with the App (e.g., features used, session duration), crash reports, and performance data (used to ensure App stability, fix errors, and improve functionality).

We do not intentionally collect: precise location data, financial information, photos, videos, audio, contact details, or other special categories of personal data (sensitive data) unless you voluntarily provide them (e.g., in a support request).

#### 4. Legal Bases and Purposes of Data Processing

We process your data only when we have lawful grounds under the General Data Protection Regulation (GDPR):

- Contractual Necessity (Article 6(1)(b) GDPR):

- Purpose: Registering your account, providing access to App features, and ensuring core functionality.

- Processed Data: Name, Email.

- Legitimate Interest (Article 6(1)(f) GDPR):

- Purposes:

- Analyzing App usage to understand user needs and improve functionality (using aggregated/anonymized data).

- Diagnosing technical issues, ensuring App stability and security (via crash reports and performance data).

- Responding to support inquiries and sending critical service notifications.

- Processed Data: Device Data, Usage Data, Name, Email (for communication).

- \*We have assessed our legitimate interests and concluded they do not override your rights. You may object to this processing (see Section 8).\*

- Consent (Article 6(1)(a) GDPR):

- We will request separate, explicit consent before collecting or processing data for purposes not described above (e.g., marketing emails).

#### 5. Data Sharing with Third Parties

We do not sell your personal information. We may share data with trusted third-party service providers (Data Processors) only as necessary for the purposes outlined in this Policy and under strict confidentiality and security obligations:

- Firebase (Google LLC): Used for anonymized usage analytics and crash reporting to improve App stability and performance.
- International Transfers: Google may process data outside the European Economic Area (EEA), including the U.S., under the EU-U.S. Data Privacy Framework. Transfers rely on Standard Contractual Clauses (SCCs) or other GDPR-compliant safeguards.
- Google's Privacy Policy: <https://policies.google.com/privacy>

All third-party providers must adhere to data security requirements and use data only per our instructions.

## 6. Data Security

We implement appropriate technical and organizational measures to protect your information from unauthorized access, alteration, disclosure, or destruction. These include encryption, access controls, and regular security updates. However, no internet transmission or electronic storage method is 100% secure.

## 7. Data Retention

- Personal Data (Name, Email): Stored as long as your account exists or until you request deletion.
- Usage/Device Data: Retained in aggregated/anonymized form for statistical analysis and App improvements but cannot be linked to you.

We delete or anonymize data after the retention period ends or upon your valid request.

## 8. Your Rights as a Data Subject

Under GDPR, you have the following rights:

- Access: Request a copy of your processed data.
- Rectification: Correct inaccurate or incomplete data.
- Erasure ("Right to be Forgotten"): Request deletion under specific conditions.
- Restriction of Processing: Limit processing during data accuracy verification.
- Objection: Object to processing based on legitimate interests (see Section 4).
- Data Portability: Receive your data in a machine-readable format.
- Withdraw Consent: Revoke consent without affecting prior lawful processing.
- Lodge a Complaint: File a complaint with a supervisory authority (e.g., Cyprus Commissioner for Personal Data Protection: <http://www.dataprotection.gov.cy>).

To exercise these rights (except complaints), contact us at [support@vaultoria.com](mailto:support@vaultoria.com). We respond within statutory deadlines (typically one month).

Note: Objecting to necessary processing (e.g., analytics) may impact service quality.

## 9. Children's Privacy

The App is not intended for users under 14 (digital consent age in Cyprus). We do not knowingly collect data from children under 14. If you believe a child has provided data, contact us immediately for deletion.

## 10. Changes to This Privacy Policy

We may update this Policy to reflect changes in practices or laws. Significant changes will be notified via email or in-App notice. The "Last Updated" date will be revised. Continued use after changes implies acceptance.

## 11. Contact Us

For questions about this Policy or data processing, contact:

Valeriy Samovarov  
Email: [support@vaultoria.com](mailto:support@vaultoria.com)